

Remarks

Applicants respectfully request reconsideration of the present U.S. Patent application as amended herein. Claims 1-3, 6, 7 and 11-13 have been amended. No claims have been added or canceled. Thus, claims 1-15 are pending.

AMENDMENTS TO THE SPECIFICATION

Paragraph 0030 has been amended to correct a typographical error.

CLAIM REJECTIONS – 35 U.S.C. § 103(a)

Claims 1-5 and 11-15 were rejected as being unpatentable over U.S. Patent No. 5,657,086 issued to Tahara, et al. (*Tahara*) in view of U.S. Patent No. 5,767,910 issued to Iizuka (*Iizuka*). For at least the reasons set forth below, Applicants submit that claims 1-5 and 11-14 are not rendered obvious by *Tahara* and *Iizuka*.

Claim 1 recites:

performing a first encoding transformation on a set of data representing a video frame as frame-based data to generate an array of frame-based coefficient data;
performing a second encoding transformation on the set of data representing the video frame as field-based data to generate an array of field-based coefficient data;
determining a number of non-zero coefficients within the array of the frame-based data;
determining a number of non-zero coefficients within the array for the field-based data;
selecting either the array of frame-based data or the array of field-based data based, at least in part, on the number of non-zero coefficients in the frame-based data and the field-based data; and
converting an ordering of the arrays of selected data.

Similarly, claim 11 recites:

means for performing a first encoding transformation on a set of data representing a video frame as frame-based data to generate an array of frame-based coefficient data;

means for performing a second encoding transformation on the set of data representing the video frame as field-based data to generate an array of field-based coefficient data;

means for determining a number of non-zero coefficients within the array of the frame-based data;

means for determining a number of non-zero coefficients within the array for the field-based data;

means for selecting either the array of frame-based data or the array of field-based data based, at least in part, on the number of non-zero coefficients in the frame-based data and the field-based data; and

means for converting an ordering of the arrays of selected data.

Thus, Applicants claim performing both frame-based transformation and field-based transformation of a video frame. Either the frame-based transformation or the field-based transformation is selected ***based, at least in part, on the number of non-zero coefficients*** in the frame-based transformation and the field-based transformation.

Tahara discloses:

...encoding picture signals in which ***either*** frame-based orthogonal transformation ***or*** field-based orthogonal transformation is selected using DCT coefficients.

See col. 14, lines 6-9 (emphasis added). Thus, *Tahara* discloses performing either frame-based transformation or field-based transformation, not both. Accordingly, *Tahara cannot* teach or suggest selection of frame-based transformed data or field-based transformed data based, at least in part, on the number of non-zero coefficients in the frame-based transformed data and the field-based transformed data.

Iizuka discloses a DCT circuit “having a complicated construction” that is capable of performing frame-based transformations and field-based transformations. Further, *Iizuka* discloses two memories, one for the frame-based data and one for the field-based

data. See col. 6, lines 1-10. The use of the transformed data is that the macroblocks may be read out of the two memories in different order. *Iizuka* does not disclose a technique for selecting between the field-based and the frame-based transformation.

Because neither *Tahara* nor *Iizuka* discloses or even suggests selection between field-based or frame-based data, no combination of *Tahara* and *Iizuka* can teach or suggest the invention as claimed in claims 1 and 11. Claims 2-5 depend from claim 1. Claims 12-15 depend from claim 11. Because dependent claims include the limitations of the claims from which they depend, Applicants submit that claims 2-5 and 12-15 are not rendered obvious by *Tahara* and *Iizuka* for at least the reasons set forth above.

CLAIM REJECTIONS – 35 U.S.C. § 103(a)

Claims 6-10 were rejected as being unpatentable over *Tahara* in view of *Iizuka* and further in view of U.S. Patent No. 5,737,020 issued to Hall, et al. (*Hall*). For at least the reasons set forth below, Applicants submit that claims 6-10 are not rendered obvious by *Tahara*, *Iizuka* and *Hall*.

The Office Action states that the combination of *Tahara* and *Iizuka*

...discloses all of the claimed subject matter discussed above with the exception of an article of manufacture comprising a software performing all of the claimed subject matter.

See page 3.

As discussed above, no combination of *Tahara* and *Iizuka* can teach or suggest the invention as claimed in claims 1-5 and 11-15. Thus, even if *Hall* discloses an article of manufacture as claimed and the combination is proper, the resulting combination

cannot teach or suggest the invention as claimed. Therefore, no combination of *Tahara*, *Iizuka* and *Hall* can teach or suggest the invention as claimed in claims 6-9.

CONCLUSION

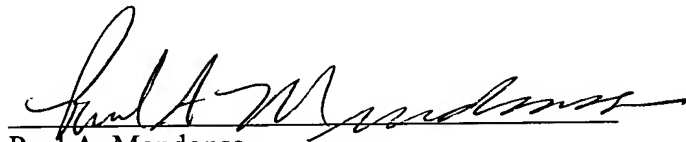
For at least the foregoing reasons, Applicants submit that the rejections have been overcome. Therefore, claims 1-15 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of the present application.

Please charge any shortages and credit any overcharges to our Deposit Account number 02-2666.

Respectfully submitted,
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